

Portsmouth/Paducah Project Office

Site Action Plan

February 2006

Commitment 23, Work Planning and Control

DNSFB Recommendation 2004-1

Approved, William Murphie, Manager Portsmouth/Paducah Project Office

Note: Change Control for this Site Action Plan (SAP) resides with the PPPO Manager, with a cc to EM-3.2.

Executive Summary

The Department of Energy (DOE) Chief Operating Officer for Environmental Management (EM) requested via memorandum, dated November 18, 2005 that EM sites take specific actions to address the Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2004-1, Commitment 23. These actions are in support of the DOE Under Secretary for Energy, Science and Environment memorandum, dated November 9, 2005, that establishes the path forward for meeting Commitment 23 of the DOE Implementation Plan for DNFSB 2004-1, Oversight of Complex, High Hazard Nuclear Operations.

This action plan documents the corrective actions to be taken based upon the results of an assessment conducted as an on-site review of field element performance. The Portsmouth Paducah Project Office (PPPO) conducted a review of the Criteria and Review Approach Documents (CRADs) provided with the memoranda to determine which CRADs might actually be assessed and those that could be addressed using information in the PPPO Oversight Database.

The PPPO and their Contractors' have demonstrated partial compliance with the work planning and work control oversight performance objectives. This action plan incorporates report results from activities associated with work planning and work control oversight conducted at both the Portsmouth and Paducah sites during calendar year 2005. Oversight activities include scheduled assessments, routine surveillances and Implementation Validation Reviews (IVRs) conducted at both sites. Limited site assessment activities were also conducted in late November and early December to address performance objectives where no clear evidence existed that the objectives had been assessed.

Overall Evaluation Summary

The following table provides the results of this assessment.

Commitment 23 Criteria and Review Approach Document	Work Planning and Control - 1	Work Planning and Control - 2	Work Planning and Control - 3	Work Planning and Control - 4	Work Planning and Control - 5	Work Planning and Control - 6	Work Planning and Control - 7
DOE PPPO	Partially Met (1 Opportunity for Improvement (OFI))	Partially Met (2 OFI's)					
Uranium Disposition Services, LLC			Met	Met	Partially Met	Met	Met
LATA/Parallax Portsmouth, LLC			Partially Met (3 OFI's)	Partially Met (1 OFI)	Partially Met (1 OFI)	Partially Met (2 OFI's)	Partially Met (1 OFI)
Theta Pro2Serve Management Company, LLC			Partially Met (1 OFI)	Met	Met	Partially Met (1 OFI)	Partially Met (2 OFI's)
Bechtel Jacobs Company			Partially Met (1 OFI)	Met	Met	Met - 1 OFI	Met
Swift and Staley Mechanical Contractors, Inc.			Partially Met (1 OFI)	Met	Partially Met (1 OFI)	Met	Partially Met (1 OFI)

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Section I- DOE Oversight

Performance Objective WPC-1: Work Planning and Control Oversight

Opportunity for Improvement #1

Formalize the PPPO processes that provide oversight of the contractors' work planning and control processes.

DOE Action	Deliverable	Due Date	Owner / Org
Revise existing PPPO requirements to clearly identify PPPO staff roles and responsibilities to conduct oversight of all stages of the Contractors' work planning and work control process on a routine basis.	Revise PPPO Management Plan.	05/31/06	D. Kozlowski/ PPPO R. Underwood/ PPPO
Develop PPPO procedure(s) to implement work planning and work control oversight to include the methods for documenting oversight activities and results.	Procedure to cover conduct audit assessments and surveillances.	05/31/06	D. Kozlowski/ PPPO R. Underwood/ PPPO
Provide training, unless exempted by previous experience and knowledge, to PPPO staff designated to conduct work planning and work control oversight.	Provide training on surveillance/assessment techniques and the methods for documenting surveillance/assessment results.	06/30/06	L. Maghrak/ PPPO J. Saluke/ PPPO
Integrate DOE O 226.1, Implementation of Department of Energy Oversight Policy, into PPPO procedures.	Revise PPPO-M-414.1, Quality Assurance Program Plan.	05/31/06	J. Gambrell/ PPPO

Responsible Manager: Rachel Blumenfeld

Performance Objective WPC-2: Work Planning and Control Oversight

Opportunity for Improvement #1

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Incorporate all stages of work planning and control into scheduled oversight activities and use those results to improve the contractors' work control processes.

DOE Action	Deliverable	Due Date	Owner /Org
Incorporate PPPO oversight activities for the contractors' work planning and work control process into the PPPO surveillance schedule.	Prepare and implement the surveillance schedule.	03/31/06	R. Underwood/ PPPO
Develop process or procedure to track and trend oversight results with a goal to improve the work planning and work control process.	DOE PPPO QAP Plan Associated Procedure	05/31/06	R. Underwood/ PPPO
Evaluate effectiveness of improvements made in the contractors' work planning and control processes.	Conduct follow-up assessment using the work planning and control criteria.	10/31/06	J. Saluke/ PPPO L. Maghrak/ PPPO

Responsible Manager: Rochelle Underwood

Opportunity for Improvement #2

Incorporate DOE Directive on oversight requirements into contracts.

DOE Action	Deliverable	Due Date	Owner / Org
Revise the PORTS and PAD contracts to include DOE O 226.1, Implementation of Department of Energy Oversight Policy.	Add DOE O 226.1 to List B in the PPPO contracts.	6/30/06	L. Parsons/ PPPO P. Thompson/ PPPO R.J. Bell/ PPPO

Responsible Manager: Rachel Blumenfeld

Performance Objective WPC-3: Work Control Program Documentation

No opportunities for improvement noted at this time.

Performance Objective WPC-4: Work Planning and Control Activity Definition and Hazard Identification

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No opportunities for improvement noted at this time.

Performance Objective WPC-5: Work Planning and Control Process No opportunities for improvement noted at this time.

Performance Objective WPC-6: Work Planning and Control Oversight No opportunities for improvement noted at this time.

Performance Objective WPC-7: Work Planning and Control Oversight No opportunities for improvement noted at this time.

Section II – UDS

Performance Objective WPC-1: Work Planning and Control Oversight No opportunities for improvement noted at this time

Performance Objective WPC-2: Work Planning and Control Oversight No opportunities for improvement noted at this time

Performance Objective WPC-3: Work Control Program Documentation No opportunities for improvement noted at this time

Performance Objective WPC-4: Work Planning and Control Activity Definition and Hazard Identification No opportunities for improvement noted at this time

Performance Objective WPC-5: Work Planning and Control Process No opportunities for improvement noted at this time.

Performance Objective WPC-6: Work Planning and Control Process No opportunities for improvement noted at this time.

Performance Objective WPC-7: Work Planning and Control Oversight No opportunities for improvement noted at this time

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Section III - LPP

Performance Objective WPC-1: Work Planning and Control Oversight

No opportunities for improvement noted at this time

Performance Objective WPC-2: Work Planning and Control Oversight

No opportunities for improvement noted at this time

Performance Objective WPC-3: Work Control Program Documentation

Opportunity for Improvement #1:

LPP-PQ-1107, *Performance Document Process* needs to be revised to fully comply with the work control and work planning requirements.

LPP Action	Deliverable	Due Date	Owner /Org
As an interim action, issue written direction to preparers of technical procedures to comply with the appropriate work planning and work control criteria.	Correspondence providing direction to preparers of technical procedures.	02/10/06	Eric Stacey Procedures
Revise LPP-PQ-1107 to incorporate the appropriate criteria from the Work Planning and Work Control CRADS.	LPP-PQ-1107, Performance Document Process	04/30/06	Eric Stacey Procedures

Responsible Manager: Dave Kent

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Opportunity for Improvement #2:

A formal process needs to be developed for the turnover of responsibilities when line managers or Superintendents are transferred. (This item also addresses PPPO observation on turnover requirements.)

LPP Action	Deliverable	Due Date	Owner /Org
Revise LPP-GM-2000 to incorporate turnover of responsibilities.	LPP-GM-2000, Conduct of Operations for Facilities, Projects and Activities	04/30/06	Eric Stacey Procedures

Responsible Manager: Tim Larabee, Work Control Manager

Opportunity for Improvement #3:

LPP Training Position Descriptions need to be developed and implemented for the Work Control Manager and for all personnel performing planning activities.

LPP Action	Deliverable	Due Date	Owner /Org
Develop approved Training Position Description (TPD) for Work Control Manager Position	Approved TPD for Work Control Manager	02/15/06	Moore Training Dept
Work Control Manager completes required training	Training records that demonstrate completion of training by the Work Control Manager required by TPD	05/01/06	Moore Training Dept
Revise TPD for Planner Position	Approved TPD for Planners	02/15/06	Moore Training Dept
Planners complete required training	Training records that demonstrate completion of training by personnel who perform prepare/plan work packages.	05/01/06	Moore Training Dept

Responsible Manager: Jerry Moore, Training Manager

Performance Objective WPC-4: Work Planning and Control Activity Definition and Hazard Identification

Opportunity for Improvement #1:

LPP-PO-1001, Work Control Process needs to be revised to fully comply with the work control and work planning requirements. Enhancements are being developed to address consideration of upset conditions, selection of controls based on an established hierarchy, ensuring that the hazards are adequately addressed through-out performance of the work, and the possibility of creating an additional hazard due to a selected control. (This item addresses PPPO observation on documenting unexpected conditions and their resolution.)

LPP Action	Deliverable	Due Date	Owner /Org
As an interim action, issue written direction to personnel who perform work package planning activities to comply with appropriate Work Control and Work Planning criteria.	Correspondence providing direction to preparers of technical procedures.	02/10/06	Tim Larabee Work Control
Develop LPP-0043 for improving work control for all LPP activities and operations	LPP-0043 Work Control Improvement Plan	1/30/06	Tim Larabee Work Control
Revise LPP-PO-1001 to incorporate the appropriate criteria from LPP-0043, Work Control Improvement Plan	LPP-PO-1001 Work Control Process	3/13/06	Tim Larabee Work Control

Responsible Manager: Tim Larabee, Work Control Manager

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Performance Objective WPC-5: Work Planning and Control Process

Opportunity for Improvement #1:

A document needs to be developed which enables planners and procedure writers to take the complexity and risk of a task and using the knowledge and training of the individuals performing the task, develop appropriate instructions. Once issued, training needs to be held with all personnel that develop work instructions in work packages or procedures to assure a consistent implementation.

LPP Action	Deliverable	Due Date	Owner /Org
Revise LPP-EH-2010 to incorporate the appropriate criteria from LPP-0043, Work Control Improvement Plan	LPP-EH-201 Hazard Assessment	03/13/06	Tim Larabee Work Control
Training of appropriate personnel as outlined in LPP-0043, Work Control Improvement Plan	Training records that demonstrate completion of training of appropriate personnel to LPP-EH-2010.	03/30/06	Moore Training Dept

Responsible Manager: Tim Larabee, Work Control Manager

Performance Objective WPC-6: Work Planning and Control Oversight

Opportunity for Improvement #1:

LPP-PO-1001 Work Control Process and LPP-GM-N001, Plan of the Week (POW) and Plan of the Day (POD) need to be revised to reflect the involvement by Facility Managers in approving work packages and subsequent authorization to perform the work.

LPP Action	Deliverable	Due Date	Owner /Org
Revise LPP-PO-1001 to incorporate the appropriate criteria from LPP-0043, Work Control Improvement Plan	LPP-PO-1001 Work Control Process	03/13/06	Tim Larabee Work Control
Revise LPP-PO-1001 to incorporate the appropriate criteria from LPP-0043, Work	LPP-GM-N001, Plan of the Week (POW) and Plan of the Day (POD)	03/13/06	Tim Larabee Work Control

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LPP Action	Deliverable	Due Date	Owner /Org
Control Improvement Plan			

Responsible Manager: Tim Larabee, Work Control Manager

Opportunity for Improvement #2:

LPP-PQ-1107, *Performance Document Process* needs to be revised to involve the appropriate Facility Managers in review and approval of procedures that result in work being performed in their facility.

LPP Action	Deliverable	Due Date	Owner /Org
Revise LPP-PQ-1107 to require Facility Manager to approve a Technical Procedure when the operational activity is being performed in their facility.	LPP-PQ-1107, Performance Document Process	04/30/06	Eric Stacey Procedures

Responsible Manager: Dave Kent

Performance Objective WPC-7: Work Planning and Control Oversight

Opportunity for Improvement #1:

A systematic approach needs to be developed and implemented to assess the effectiveness of work planning and work control using measurable indicators as much as possible. (This item also addresses PPPO observation on implementation of routine assessment of work control processes and trending results of the oversight activities.)

LPP Action	Deliverable	Due Date	Owner /Org
Determine what elements of Work Planning and Work Control are most important to the overall effectiveness of the program	An internal memorandum that identifies the important elements.	02/20/06	Tim Larabee Work Control
Determine the methods that will be used to measure important elements	An internal memorandum to the QA Manager identifying the methods to measure the important elements.	02/20/06	Tim Larabee Work Control

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LPP Action	Deliverable	Due Date	Owner /Org
Revise/Develop documents that documents the results of the measurements	Revised oversight plan Performance Indicator charts	03/17/06	Mike MacCrae, QA Mike MacCrae, QA
		03/1//06	

Responsible Manager: Mike MacCrae

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Section IV - TPMC

Performance Objective WPC-1: Work Planning and Control Oversight

No opportunities for improvement noted at this time

Performance Objective WPC-2: Work Planning and Control Oversight

No opportunities for improvement noted at this time

Performance Objective WPC-3: Work Control Program Documentation

Opportunity for Improvement #1: Performance documents were cover sheeted from the previous Contractor and have not been revised to be fully integrated into the TPMC system to accurately reflect organization roles and other administrative differences.

TPMC Action	Deliverable	Due Date	Owner/Organization
Managers prioritize (0, 1, 2 and 3, with 1 as the highest priority) assigned performance documents for revision, and provide lists to Procedure Manager.	Prioritized lists of assigned performance documents.	January 16, 2006	Managers (collectively under Buck Sheward, President)
Procedure Manager combine Manager prioritized lists into one list.	Combined prioritized list of performance documents	January 23, 2006	Chip Stanizzo, Procedure Manager, Environmental, Safety, Health and Quality
Procedure Manager meet with Managers to develop Performance Documents Work-Off Plan to revise prioritized performance documents [Priority 1 and 2, including those needed to implement the Integrated Safety Management System (ISMS), by June 30, 2006, and Priority 3 by December 31, 2006].	Performance Documents Work-Off Plan	February 15, 2006	Chip Stanizzo, Procedure Manager, Environmental, Safety, Health and Quality
Quality Assurance (QA) Specialist enter rolling 30-day look-ahead action assignments to implement the	Tracker 30-day look-ahead Performance Documents Work-Off Plan action assignments.	February 20, 2006	Cathy Forshey, QA Specialist, Environmental, Safety, Health and Quality

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TPMC Action	Deliverable	Due Date	Owner/Organization
Performance Documents Work-Off Plan into the Commitment Tracking System (Tracker) for closure tracking.			
Complete Priority 1 and 2 performance document revisions.	Tracker action assignments closure documentation.	June 30, 2006	Managers (collectively under Buck Sheward, President), and Chip Stanizzo, Procedure Manager, Environmental, Safety, Health and Quality
Complete Priority 3 performance document revisions.	Tracker action assignments closure documentation.	December 31, 2006	Managers (collectively under Buck Sheward, President), and Chip Stanizzo, Procedure Manager, Environmental, Safety, Health and Quality
PPPO Contractors' applying a graded approach, review and revise their work control procedure to include a formal documented process for turning over requirements when line management and/or first line supervisor responsibilities are transferred. (PPPO Observation)	Revise FS-1026, Personnel Turnovers.	June 31, 2006	Chris Ondera, O&M, Operations and Maintenance

Responsible Manager: Elise Allison, ESH&Q Manager

Performance Objective WPC-4: Work Planning and Control Activity Definition and Hazard Identification No opportunities for improvement noted at this time.

Performance Objective WPC-5: Work Planning and Control Process

No opportunities for improvement noted at this time.

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Performance Objective WPC - 6. Work Planning and Control Process

Opportunity for Improvement #1: Some documentation, such as pre-job safety meetings attendance and job walkdowns, is inconsistent. Some documents fully reflect attendance and subjects of discussion and others appear incomplete or unavailable, when it can be independently confirmed that the activity took place. Formal activities (meetings, walkdowns, etc.) described in the work control and supporting procedures need to be fully documented (agendas, attendance sheets, meeting notes, etc.), and reflect all personnel in attendance to ensure objective evidence of completion.

TPMC Action	Deliverable	Due Date	Owner/Organization
Operations and Maintenance (O&M) Manager work with Supervisors to identify work control activities requiring written documentation, and aids (e.g., logs, forms, etc.) for providing documentation.	Memo to file of list of work control activities requiring written documentation, and aids for providing documentation.	January 27, 2006	Chris Ondera, O&M Manager, Operations and Maintenance
O&M Manager work with Supervisors to develop and implement aids (e.g., logs, forms, etc.) for the activities requiring written documentation.	Memo to file of development and implementation of aids.	March 6, 2006	Chris Ondera, O&M Manager, Operations and Maintenance
QA Program Lead conduct assessment to verify aids (e.g., logs, forms, etc.) for the activities requiring written documentation have been implemented and are effective.	Assessment report.	April 21, 2006	Dan Longpre, QA Program Lead, Environmental, Safety, Health and Quality

Responsible Manager: Chris Ondera, O&M Manager, Operations & Maintenance

Performance Objective WPC - 7. Work Planning and Control Oversight

Opportunity for Improvement #1:

The Oversight Plan is in "Draft" completion and will be issued by January 2006.

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TPMC Action	Deliverable	Due Date	Owner/Organization
QA Program Lead issue Oversight Plan	Oversight Plan	January 31, 2006	Dan Longpre, QA Program Lead, Environmental, Safety, Health and Quality

Responsible Manager: Elise Allison, ESH&Q Manager

Opportunity for Improvement #2: The QA Trending Program is in development and will periodically (expected Quarterly, beginning March 2006) compile selected assurance data into a summary report for review by management and DOE to help in focusing on improvement areas, where needed.

TPMC Action	Deliverable	Due Date	Owner/Organization
QA Program Lead meet with Managers and DOE to identify trending criteria.	Memo to file of list of Trending Criteria	February 3, 2006	Dan Longpre, QA Program Lead, Environmental, Safety, Health and Quality
QA Program Lead meet with	Trending System Plan	February 20,	Dan Longpre, QA Program
Information Technology (IT)		2006	Lead, Environmental, Safety,
Programmer and QA Specialist to			Health and Quality
develop Trending System Plan.			
3. IT Programmer work with QA	Tracker action assignments closure	April 3, 2006	Tim Burton, Computing and
Specialist to complete Trending	documentation.		Telecommunications Manager
System Plan, and enter trending data			·
into database, as appropriate.			
4. QA Specialist work with IT	Trending Report	April 17, 2006	Cathy Forshey, QA Specialist,
Programmer to generate first Quarterly			Environmental, Safety, Health
Trending Report			and Quality

Responsible Manager: Elise Allison, ESH&Q Manager

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Section V – BJC

(NOTE: BJC is transitioning out as the Remediation Contractor for the Paducah Site. PRS will assume responsibility on April 24, 2006)

Performance Objective WPC-1: Work Planning and Control Oversight

No opportunities for improvement noted at this time

Performance Objective WPC-2: Work Planning and Control Oversight

No opportunities for improvement noted at this time

Performance Objective WPC-3: Work Control Program Documentation

Opportunity for Improvement #1:

Turnover of line management and/or first line supervisor responsibilities not specified in contractors procedure/instructions.

BJC Action	Deliverable	Due Date	Owner/Organization
Revise PA-1001, "Paducah Work Control	Revised PA-1001 procedure includes	March 1, 2006	BJC-Randy Crawford
Process", to include attachment for Line	attachment for Line Management and/or		Facility/Operations
management and/or first line supervisor	First Line supervisor responsibility	-	Manager
responsibility transfer.	transfer.		_

Responsible Manager: Randy Crawford, Facility/Operations Manager

Performance Objective WPC-4: Work Planning and Control Activity Definition and Hazard Identification No opportunities for improvement noted at this time

Performance Objective WPC-5: Work Planning and Control Process

No opportunities for improvement noted at this time.

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Performance Objective WPC-6: Work Planning and Control Oversight

Opportunity for Improvement #1:

The review of project work packages identified that worker training matrices were not always incorporated into the work packages.

BJC Action	Deliverable	Due Date	Owner/Organization
1.Revise PA-1001, Paducah Work	Revised PA-1001, Paducah Work Control	March 1, 2006	BJC-Randy Crawford
Control Process to include a requirement	Process includes a requirement to		Facility/Operations
to incorporate the worker training	incorporate the worker training matrices		Manager
matrices or document where the matrices	or document where the matrices are locate		
are locate			

Responsible Manager: Randy Crawford, Facility/Operations Manager

Performance Objective WPC-7: Work Planning and Control Oversight

No opportunities for improvement noted at this time.

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Section VI - SST

Performance Objective WPC-1: Work Planning and Control Oversight

No opportunities for improvement noted at this time

Performance Objective WPC-2: Work Planning and Control Oversight

No opportunities for improvement noted at this time

Performance Objective WPC-3: Work Control Program Documentation

Opportunity for Improvement #1

SST Procedure 6.1.1 does not specifically call out turnover requirements with respect to transfer of line management/first line supervisor responsibilities. SST will add those requirements when the procedure is next revised.

SST Action	Deliverable	Due Date	Owner / Org
Revise SST Procedure 6.1.1 to add turnover requirements.	Revised Procedure 6.1.1. approved and issued. Notify local DOE representative.	06/30/06	S. Smith, SST

Responsible Manager: S. Smith, SST

Performance Objective WPC-4: Work Planning and Control Activity Definition and Hazard Identification No opportunities for improvement noted at this time

Performance Objective WPC-5: Work Planning and Control Process

Opportunity for Improvement #1

SST does not specify in the work control documents the work steps for activities unless the activity is associated with work on a system that requires proper sequencing to safely perform the tasks. Work sequencing is discussed during the planning stage of the work and during the pre-job briefings.

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SST Action	Deliverable	Due Date	Owner /Org
SST to evaluate the appropriateness of providing sequencing steps in their work control documents.	Update SST work control procedures to require sequencing of steps in work control documents as appropriate.	06/30/06	S. Smith, SST

Responsible Manager: S. Smith, SST

Performance Objective WPC-6: Work Planning and Control Process

No opportunities for improvement noted at this time

Performance Objective WPC-7: Work Planning and Control Oversight

Opportunity for Improvement #1

Currently, audit and assessment results (findings and observations) are not being tracked in a database suitable for tracking, retrieval, and trending.

SST Action	Deliverable	Due Date	Owner /Org
Backfit assessment results into the SST Corrective Action Tracking System.	Provide status report to local DOE representative.	03/30/06	T. Stanberry, SST

Responsible Manager: T. Stanberry, SST

Work Planning and Control Good Practices

Although good practices were identified by DOE and the Contractors, these good practices lacked adequate justification or specificity to be included. DOE will identify future good practices as part of our oversight program.